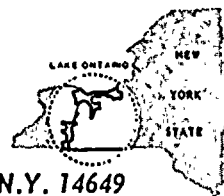




ROCHESTER GAS AND ELECTRIC CORPORATION • 89 EAST AVENUE, ROCHESTER, N.Y. 14649

JOHN E. MAIER
VICE PRESIDENT

TELEPHONE
AREA CODE 716 546-2700



July 20, 1981

Mr. James H. Joyner, Chief
Technical Inspection Branch
Division of Engineering and Technical Inspection
U.S. Nuclear Regulatory Commission
Region I
631 Park Avenue
King of Prussia, Pennsylvania 19406

SUBJECT: Response to NRC Inspection 81-07 conducted by
R. L. Nimitz on March 22-26, 1981

Dear Mr. Joyner:

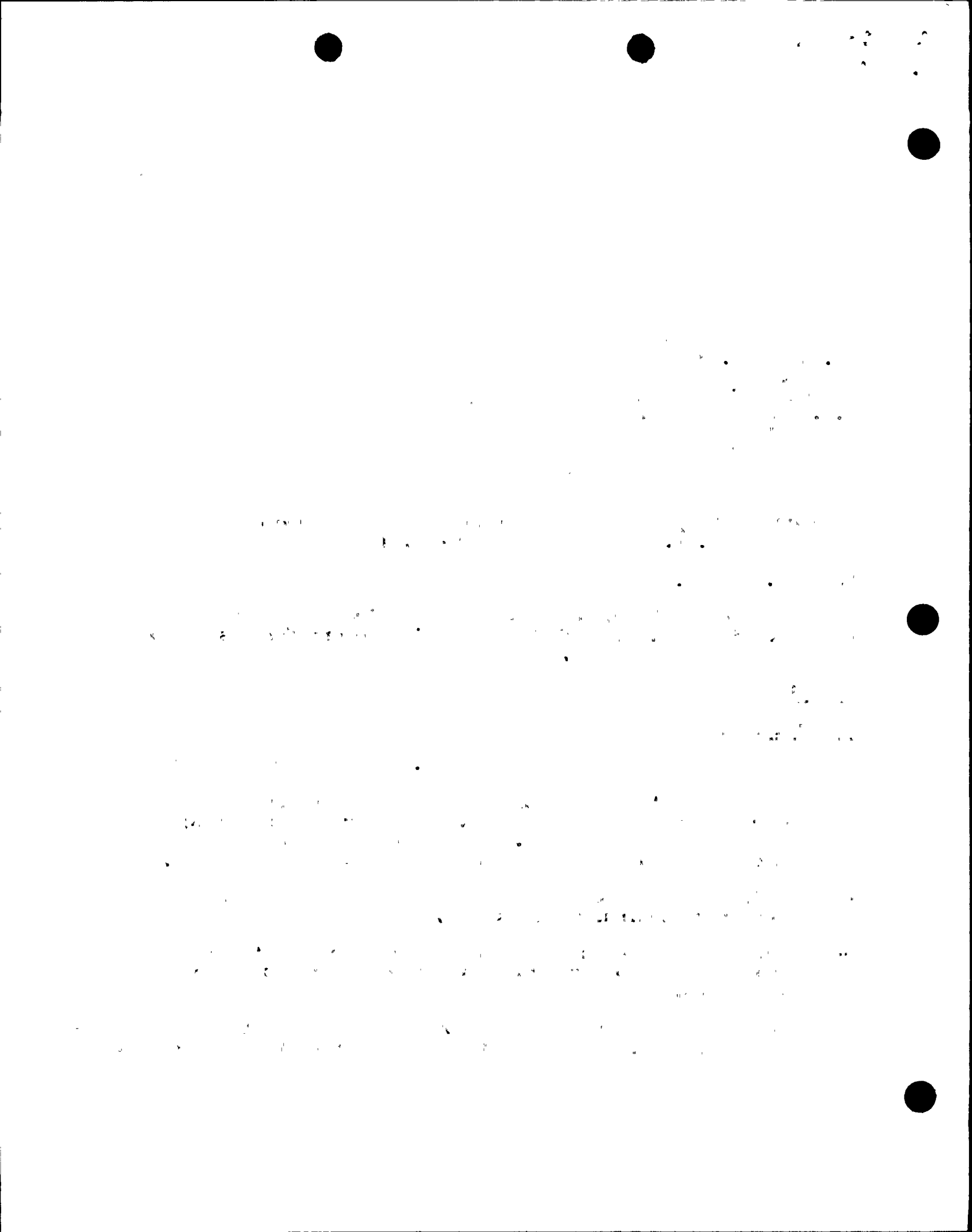
This letter is in response to the notice of violation contained in Appendix A of the inspection report for inspection 81-07 received on June 22, 1981.

Item 1

NRC Finding:

Contrary to section C.4 of Reg Guide 8.15 as of March 22, 1981

- the licensee's respiratory protective equipment maintenance procedure did not contain provisions for proper storage of respirator facepieces. Facepieces were stored 4-5 layers deep which could result in facepiece deformation,
- no inspection procedures existed for new respiratory protective equipment inspection,
- maintenance procedures for used respiratory protective equipment did not prohibit interchanging or respirator components, and
- no repair procedures existed for respiratory protective equipment other than for self-contained breathing apparatus.



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RG&E Response:

In response to the NRC inspection on March 18, 1981, the use of protection factors for all Ginna respiratory equipment was suspended. The use of approved respirators was continued to insure maximum personnel protection but MPC hours were determined without the use of protection factors whenever respirators were used.

New mask storage bins have been constructed and are currently in use. These bins are constructed so only a limited number of masks can be placed in each storage slot. The masks are also numbered and are stored by procedure in assigned slots in the storage bins. This will insure that the masks are stored properly to preclude facepiece deformation.

Separate procedures have been written for the three types of respirators currently in use. These procedures cover the cleaning, maintenance and storage methods for each respirator.

All existing respiratory equipment for which protection factors are being taken have been inspected and accepted by the plant Q.C. Department. All new respiratory equipment and parts are being ordered on Q.A. purchase orders requiring receipt inspection, which will satisfy the provisions of NUREG-0041.

Item 2

NRC Finding:

Contrary to section C.5 of Reg. Guide 8.15 as of March 22, 1981, the licensee was using a non-approved respiratory facepiece/filter combination and did not make allowance for such.

RG&E Response:

All ACME 4704 masks have been removed from service and destroyed. They have been replaced with the new "Scott-O-Vista" facepiece approved under NIOSH TC-21-C-199.

The ACME 4704 mask facepiece in use was virtually identical to the NIOSH-approved facepiece, with the exception of a flow diffuser part, which also enabled use of the 4704 mask with supplied air. Although the respirator facepiece/filter combination being used did not have a specific NIOSH approval number, the respirator was fully performing its intended function and did not jeopardize work safety.

1. Introduction

The purpose of this report is to provide a comprehensive overview of the current state of the project. It will cover the progress made since the last meeting, the challenges encountered, and the proposed solutions. The report is intended for the project steering committee and all stakeholders involved in the project.

The project has made significant progress in the areas of research and development. The initial phase of the project, which focused on identifying the key requirements and defining the scope, has been completed. The next phase, which involves the design and implementation of the system, is currently underway.

During the design phase, several challenges have been identified. These include the need for a more robust database system, the requirement for a more flexible user interface, and the need for a more efficient data processing algorithm. These challenges will be addressed in the implementation phase.

The project is currently on track to meet the deadline. The steering committee has approved the proposed solutions to the challenges identified during the design phase. The implementation phase is expected to be completed by the end of the year.

2. Project Overview

2.1 Project Goals

The primary goal of the project is to develop a new system that will improve the efficiency of the data processing workflow. The system should be able to handle large volumes of data and provide real-time reporting capabilities.

2.2 Project Scope

The project scope includes the design and implementation of the system, the testing and deployment of the system, and the training of the end users. The project will also include the development of a user manual and a support plan.

The project is currently in the design phase. The design team has completed the initial design of the system and is currently working on the detailed design. The implementation team is also working on the development of the system components. The project is expected to be completed by the end of the year.

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Item 3

NRC Finding:

Contrary to section C.8 of Reg Guide 8.15 as of March 22, 1981, odor tests were not being performed and documented on plant breathing air systems.

RG&E Response:

Odor checks for breathing air are now being performed and documented by procedure HP-12.7, Containment Constant Flow Breathing Air System Setup.

Sincerely,


John E. Maier

Subscribed and sworn to me
on this 20th day of July 1981.



SHARON G. CAVALERI
NOTARY PUBLIC, State of N. Y., Monroe County
My Commission Expires March 30, 1983

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